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COMMUNITY
DEVELOPMENT

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June 1, 2012

Minnie Dhaliwal

City of Tukwila Department of Community Development
6300 Southcenter Boulevard, Suite 100
Tukwila, Washington 98188

Re: Jorgensen Forge Corporation National Pollution Discharge Elimination System
Remedy Project

Dear Ms. Dhaliwal:

The Jorgensen Forge Corporation proposes to conduct repair activities to its stormwater treatment system at its site along the shore of the Lower Duwamish River. These activities are necessary to bring the site into compliance with its existing National Pollution Discharge Elimination System (NPDES) permit. The project is located within the City of Tukwila's shoreline designation of "High Intensity." Further details regarding the project are provided below.

Location

8531 East Marginal Way South Tukwila, WA 98108

The property is located within a Shoreline Designation of "High Intensity" as defined in Chapter 8.6 of the City of Tukwila's Shoreline Master Program (SMP).

Background

Jorgensen Forge Corporation (Jorgensen Forge) receives coverage under The Washington State Department of Ecology's (Ecology) Industrial Stormwater General Permit (#WAR003231). Under the guidance and approval of Ecology, Jorgensen Forge is planning

stormwater conveyance and treatment system repairs and renovations to meet the requirements of a Level 3 Corrective Action and Administrative Order (AO), Docket #8682.

The Jorgensen Forge facility is currently not meeting the Permit benchmarks for stormwater discharge. As part of the AO requirements issued by Ecology, the facility must have an operational a stormwater treatment system designed to meet the Permit benchmarks for stormwater discharge by September 30, 2012. Jorgensen Forge is currently in the process of requesting an extension of this date to December 31, 2012. Completion of an engineering report detailing the treatment design and stormwater conveyance modifications is scheduled to be submitted to Ecology for review and approval in May 2012.

Project Purpose

The purpose of this project is to repair the existing stormwater conveyance system so that the stormwater discharge from the site into the Duwamish River meets current benchmark values as specified under the Industrial Stormwater General Permit WAR003231 as directed by Ecology. No development beyond repair and renovation of the existing system is proposed.

Proposed Project

In order to comply with the AO issued by Ecology, The Jorgensen Forge Corporation proposes to perform renovation and repair activities on the existing stormwater conveyance system. The current system includes three pipes that collect surface flows from the site and outfalls into the Duwamish River. The project would intercept flows from the three pipes with a new pipe located approximately 110' to 150' from Ordinary High Water as shown on the attached figure. The pipe would be approximately 250 feet long and located approximately 12 to 15 feet underground at the same general elevation as the existing pipes. The interceptor pipe would terminate at the third pipe (furthest north). A vault would be installed in order to manage flows where the pipes connect to minimize the potential for pipe failure.

Flows would be conveyed from the vault to a modular above ground equalization tank, and to be determined treatment technology outside of the shoreline zone. Flows from the treatment system would then be conveyed back into the existing pipe and allowed to

discharge into the Duwamish River. No new outfalls are proposed as part of this project, no existing outfalls will be modified, and stormwater conveyance from the site will be at equal or smaller volumes than under existing conditions. All work would be located outside of the 100' buffer for areas defined as High Intensity by the City of Tukwila's SMP. The interceptor pipe and vault would be located within the 200 foot shoreline management zone and the modular treatment system would be located outside (upland) of the 200 foot shoreline management zone.

Shoreline Substantial Development Permit Exemption

Jorgensen Forge requests a Shoreline Substantial Development Permit Exemption based on the "normal repair and maintenance" exemption as defined in Chapter 3 of the City of Tukwila's SMP. Normal repair is further defined in WAC 173-27-040(2)(b) "means to restore a development to a state comparable to its original condition...within a reasonable period after decay...". The definition further states that "Replacement of a structure or development may be authorized as repair where such replacement is in common method of repair for the type of structure or development and the replacement structure or development is comparable to the original structure or development..."

The Jorgensen Forge facility has been operating under an industrial stormwater permit since 1998. The system operated within compliance of the permit until 2008 when discharges exceeded benchmark thresholds. The proposed renovations and repairs to the existing stormwater treatment system are common methods of repair when stormwater conveyance systems fail to meet benchmark discharge requirements. The repair has been designed only to meet current stormwater benchmark thresholds as mandated in the AO issued by Ecology. The repairs will only convey existing stormwater flows as intended when the original stormwater system was constructed. As a result of this repair, the conveyance capacity of the system will not increase.

We further request a SEPA exemption for the investigation per *Washington Administrative Code (WAC) 197-11-800 (3) – Repair, remodel and maintenance activities*, which states that "The following activities shall be categorically exempt: The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including

utilities, involving no material expansions or changes in use beyond that previously existing..."

Feel free to call me at (206) 903-3388, or e-mail me at jmckinney@anchorqea.com, should there be any questions.

Sincerely,



Jason McKinney
Anchor QEA, LLC

cc: Nathan Soccorsy, Anchor QEA, LLC

Attachments: Figure 5 – Preliminary Stormwater Treatment and Conveyance Plan